Nathan D. Alder, #7126 Sarah Elizabeth Spencer, #11141 CHRISTENSEN & JENSEN, P.C. 257 East 200 South, Suite 1100 Salt Lake City, Utah 84111-2047 Telephone: (801) 323-5000 nathan.alder@chrisjen.com sarah.spencer@chrisjen.com

Thomas M. Klein, pro hac vice KLEIN THOMAS 340 East Palm Lane, Suite A310 Phoenix, Arizona 85004 Telephone: 602-935-8300 tom.klein@kleinthomaslaw.com

Attorneys for FCA US LLC

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF UTAH, CENTRAL DIVISION

MINDY CASTLEMAN, an individual,

Plaintiff,

VS.

FCA US LLC, f/k/a Chrysler Group, LLC

Defendant.

STIPULATED MOTION TO DISMISS WITH PREJUDICE

Case No. 2:18-cv-00342-JNP-PMW

District Judge Jill N. Parrish

Plaintiff, Mindy Castleman, and Defendant, FCA US LLC, by and through undersigned counsel, hereby jointly move the Court for an order of dismissal with prejudice, and stipulate as follows:

1. Plaintiff's Complaint and all causes of action shall be dismissed with prejudice. All pleadings, causes of action, claims, and rights of recovery that were raised or could have been raised in this case shall be dismissed, with prejudice.

- 2. Each party shall bear its own costs and attorney fees.
- 3. A proposed order is submitted herewith.
- 4. Based upon the foregoing, the parties jointly move the Court for an order dismissing this action with prejudice.

DATED this 23rd day of January, 2020.

CHRISTENSEN & JENSEN, P.C.

/s/ Thomas M. Klein
Nathan D. Alder
Sarah Elizabeth Spencer

Thomas M. Klein, *pro hac vice* KLEIN THOMAS

Attorneys for FCA US LLC

DEWSNUP KING OLSEN HAVAS MORTENSEN

/s/ Colin P. King (w/permission)

Colin P. King Lance L. Milne Peter W. Summerill

Robert J. Francavilla Meagan L. Verschueren CASEY GERRY SCHENK FRANCAVILLA BLATT & PENFIELD, LLP

Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on this 23rd day of January, 2020, a true and correct copy of the foregoing **STIPULATED MOTION TO DISMISS WITH PREJUDICE** was delivered via the court's CM/ECF electronic filing system to the following:

Colin P. King
Lance L. Milne
Peter W. Summerill
DEWSNUP KING OLSEN
HAVAS MORTENSEN
36 S. State Street, Suite 2400
Salt Lake City, UT 84111
cking@dkowlaw.com
lmilne@dkowlaw.com
psummerill@dkowlaw.com

Robert J. Francavilla Meagan L. Verschueren CASEY GERRY SCHENK FRANCAVILLA BLATT & PENFIELD, LLP 110 Laurel Street San Diego, California 92101-1419 rjf@cglaw.com meagan@cglaw.com

Attorneys for Plaintiff

/s/ D. Schwartz